

SDD:TAD
F.# 2016R00532

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

SINMYAH AMERA CEASAR,
also known as “Rita Daoudii,”
“Qeuz,” “UmmNutellaBundoq,”
“Amera Dawah Shakir,”
“Bint Dawah Muslimah,”
and “Qulli Allahu Akbar,”

I N F O R M A T I O N

Cr. No. _____
(T. 18, U.S.C., §§ 981(a)(1)(C),
981(a)(1)(G), 2339B(a)(1), 2339B(d), and
3551 *et seq.*; T. 21, U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))

Defendant.

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THE UNITED STATES ATTORNEY CHARGES:

CONSPIRACY TO PROVIDE MATERIAL SUPPORT
TO A FOREIGN TERRORIST ORGANIZATION

1. On or about and between January 1, 2016 and November 15, 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SINMYAH AMERA CEASAR, also known as “Rita Daoudii,” “Qeuz,” “UmmNutellaBundoq,” “Amera Dawah Shakir,” “Bint Dawah Muslimah,” and “Qulli Allahu Akbar,” together with others, did knowingly and intentionally conspire to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including personnel, including herself, to a foreign terrorist organization, to wit: the Islamic State of Iraq and the Levant (“ISIL”), which at all relevant times has been designated by the Secretary of

State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act, knowing that the organization was a designated terrorist organization and the organization had engaged in and was engaging in terrorist activity and terrorism, and the defendant was a national of the United States (as defined in section 1101(a)(22) of the Immigration and Nationality Act), the offense occurred in part within the United States, and the offense occurred in and affected interstate and foreign commerce.

(Title 18, United States Code, Sections 2339B(a)(1), 2339B(d) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant SINMYAH AMERA CEASAR, also known as “Rita Daoudii,” “Qeuz,” “UmmNutellaBundoq,” “Amera Dawah Shakir,” “Bint Dawah Muslimah,” and “Qulli Allahu Akbar,” that, upon her conviction of the above-charged offense, the government will seek forfeiture in accordance with (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any property, real or personal, constituting or derived from proceeds traceable to such offense, and (b) Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c), which require the forfeiture of all assets, foreign or domestic: (i) of any individual, entity, or organization engaged in planning or perpetrating any Federal crime of terrorism (as defined in Title 18, United States Code, Section 2332b(g)(5)) against the United States, citizens or residents of the United States, or their property, and all assets, foreign or domestic, affording any person a source of influence over any such entity or organization; (ii) acquired or maintained by any person with the intent and for the purpose of supporting, planning, conducting, or concealing any Federal crime of

terrorism (as defined in Title 18, United States Code, Section 2332b(g)(5)) against the United States, citizens or residents of the United States, or their property; (iii) derived from, involved in, or used or intended to be used to commit any Federal crime of terrorism (as defined in Title 18, United States Code, Section 2332b(g)(5)) against the United States, citizens or residents of the United States, or their property; or (iv) of any individual, entity or organization engaged in planning or perpetrating any act of international terrorism (as defined in Title 18, United States Code, Section 2331) against any international organization (as defined in Title 18, United States Code, Section 4309(b)) or against any foreign Government.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
 - (a) cannot be located upon the exercise of due diligence;
 - (b) has been transferred or sold to, or deposited with, a third party;
 - (c) has been placed beyond the jurisdiction of the court;
 - (d) has been substantially diminished in value; or
 - (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 981(a)(1)(C) and 981(a)(1)(G); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

ROBERT L. CAPERS
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. O.136

F. #2016R00532
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of NEW YORK*

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

*SINMYAH AMERA CEASAR, also known as "Rita Daoudii," "Qeuz,"
"UmmNutellaBundoq," "Amera Dawah Shakir," "Bint Dawah
Muslimah," and "Qulli Allahu Akbar,"*

Defendant.

INFORMATION

(T. 18, U.S.C., §§ 981(a)(1)(C), 981(a)(1)(G), 2339B(a)(1), 2339B(d)
and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20____

Clerk

Bail, \$ _____

*Tiana A. Denas and Una A. Dean,
Assistant U.S. Attorneys (718) 254-7000*